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Counsel for Plaintiffs, Opt-in Plaintiffs and Putative Class

[Additional Counsel of Record listed on the Signature page]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al., individually and
on behalf of others similarly situated,
Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,
Defendant.

Case No. 3:18-cv-01477-JR

**PARTIES' JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
DEADLINES FOR OBJECTIONS TO
FINDINGS AND RECOMMENDATIONS
AND RESPONSES**

Plaintiffs Kelly Cahill, *et al.* (“Plaintiffs”) and Nike, Inc. (“Nike” or “Defendant”) (collectively, the “Parties”), through their respective counsel hereby present the following stipulated and agreed upon revised deadlines for objections to the Court’s Findings and Recommendations and responses to such objections and request that the Court enter an order regarding the same.

The Parties Have a Good Faith Basis for Revising the Default Deadlines

On November 22, 2022, Magistrate Judge Russo issued Findings and Recommendations on Plaintiffs’ Motion for Class Certification and related filings, ECF No. 310 (“F&R”). Under the default deadlines, the Parties have 14 days to file objections and then 14 days to file responses to any objections. ECF No. 311.

The Parties have conferred and in light of the scope and importance of the F&R, numerous intervening holidays, unavailability of counsel, and the absence of any other impacted litigation deadlines, the Parties stipulate to and respectfully request that the Court enter an order revising the default deadlines for filing objections to the F&R and responding to such objections.

STIPULATED REVISED DEADLINES

The Parties hereby stipulate and agree and request the Court order the following revised deadlines (the default dates are provided in the first column for ease of reference):¹

Deadline	Default Date	Proposed Date
Deadline for Party to File Objections	12/6/22	12/22/22
Deadline for Party to File Responses to Objections	12/20/22	1/26/23

¹ This request is limited only to an extension of time for the discussed deadlines. It does not raise any requests regarding an enlargement of the page limits for any objections and responses to the F&R, which would be the subject of a separate request, if any. Plaintiffs believe it is premature to raise or discuss this issue. Nike does not believe any such request to be proper given, for example, the Magistrate’s review of the briefing and ancillary documents in this matter.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: November 29, 2022

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

/s/ James Kan

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Attorneys for Plaintiffs and Opt-In Plaintiffs

Dated: November 29, 2022

Respectfully submitted,

/s/ Daniel Prince

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Attorneys for Nike, Inc.

SIGNATURE ATTESTATION

In accordance with Civil Local Rule 11(b)(2), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

Dated: November 29, 2022

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

/s/ James Kan
James Kan (admitted *pro hac vice*)

[PROPOSED] ORDER

The Court has reviewed the Parties' Joint Stipulation Regarding Deadlines for Objections to Findings and Recommendations and Responses and hereby enters the same as reflected below.

Deadline	Date
Deadline for Party to File Objections	12/22/22
Deadline for Party to File Responses to Objections	01/26/23

IT IS SO ORDERED.

Dated:

JOLIE A. RUSSO
United States Magistrate Judge